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17 *Attorneys for Scott Schutzman*

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE DISTRICT OF NEVADA**

20 JANET SOBEL, DANIEL DUGAN, Ph. D.,
21 LYDIA LEE, and MARK SINGER,
22 individually and on behalf of all others
23 similarly situated,

24 Plaintiffs,

25 v.

26 THE HERTZ CORPORATION, a Delaware
27 Corporation, ENTERPRISE LEASING
28 COMPANY-WEST, LLC, a Delaware LLC,
and VANGUARD CAR RENTAL USA,
LLC, a Delaware LLC,

Defendants.

No. 3:06-CV-00545 LRM-RAM

For customers of:

Alamo Rent A Car and Hertz

OBJECTOR SCOTT SCHUTZMAN'S SUPPLEMENT IN SUPPORT OF HIS MOTION
FOR ATTORNEY'S FEES AND COSTS AND FOR SERVICE AWARD

1
2 Objector, SCOTT SCHUTZMAN (“**Schutzman**”) and his attorneys, hereby submits this
3 Supplement to the attorney fees and costs records previously submitted in connection with his
4 motion for attorney’s fees and costs and for service award filed on June 25, 2014. *See* exhibits
5 attached to Doc. No. 410 and Doc. No. 412. A Supplemental Declaration is attached as
6
7 “**Exhibit 1.**” Since June 25, 2014, Schutzman’s attorneys have incurred additional attorney’s
8 fees and costs, including time spent reviewing all fee-related pleadings filed by the parties and
9 non-parties, and replying to Class Counsel’s response to Schutzman’s motion for attorney’s fees
10 and costs and for service award. Schutzman will incur additional attorney’s fees and costs
11 preparing for, traveling to and attending the September 23, 2014 hearing on all pending attorney
12 fee and costs motions, including his own, as ordered by the Court.
13

14
15 To date, the lodestar calculation for Schutzman’s attorney’s fees is **\$103,333.75**
16 (\$18,360.00 [this Supplemental Declaration] + \$30,298.00 [Doc. No. 410-4] + \$54,675.75 [Doc.
17 No. 412-2; 412-3]). With the application of a 2.5 multiplier to the lodestar calculation, the total
18 attorney’s fee would be **\$258,334.37**. To date, the total costs incurred are **\$4,221.68** (\$1,449.75
19 [this Supplemental Declaration] + \$778.64 [Doc. No. 410-4] + \$1,993.29 [Doc. No. 412-4; 412-
20 5]). This supplement is not intended to modify the percentage method of calculation of
21 attorney’s fees advocated by Schutzman in his briefing. Finally, Schutzman notes that Class
22 Counsel opposes his entitlement to attorney’s fees and costs, as well as the amount sought. *See*
23 *In re Nucorp Energy, Inc.*, 764 F.2d 655, 659-60 (9th Cir. 1985)(“In statutory fee cases, federal
24 courts, including our own, have uniformly held that time spent in establishing the entitlement to
25 and amount of the fee is compensable.”).
26
27
28

1 Dated: September 19, 2014.

2 Respectfully submitted,

3 /s/ Joel Ewusiak

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23 **CERTIFICATE OF SERVICE**

24 The undersigned certifies that, on September 19, 2014, a true copy of the foregoing was
25 filed using the CM/ECF system, which will provide electronic notice to all counsel of record.

26 /s/ Joel Ewusiak

27 **Joel Ewusiak**